

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

IN RE: NAHID AHMADPOUR

:  
:  
: Case No.: 18-11248  
:  
Debtor. : Chapter 7

**OPPOSITION TO CREDITOR, NATIONWIDE REGISTRY & SECURITY LTD'S  
OBJECTION TO DEBTOR'S CLAIM OF EXEMPTIONS**

Debtor's counsel, respectfully oppose Nationwide Registry & Security LTD's (the "movant") Objection to Debtor's Claim of Exemptions as a premature filing.

In support of this opposition, counsel states as follows:

1. On January 30, 2018, the debtor(s) filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.
2. On January 30, 2018, the debtor filed her original Schedule C, Docket No. 1 and filed an Amended Schedule C on March 9, 2018, Docket No. 43
3. On or about March 13, 2018, the movant filed an Objection to Debtor's Claim of Exemptions, essentially objecting to the wild card exemption of debtor(s)' legal "claims for violation of Debtor's discharge in prior Chapter case, and for FCPA violations, other consumer protection violations, abuse of process, malicious prosecution, breach of contract, and fraud, against Nationwide Registry & Security, Ltd." In addition, it appears that the movant basis for disallowing the debtor's exemptions are based on the movant's allegations in their filed adversary case.
4. In that regard, the debtor(s) is actively contested movant's allegations in the adversary case. It is also debtor(s)' position, that the movant's objection is a premature action and that the Court should delay ruling or deny the movant's request for relief until the matters in the adversary case are resolved.

5. Therefore, counsel requests that the Motion filed by the movant be denied or ruled upon after the adversary proceedings are resolved.

WHEREFORE, for these and such other reasons as may appear to the Court, counsel respectfully requests that the movant's motion be denied or ruled upon after the adversary proceedings are resolved.

By /s/ Kevin Judd  
Kevin D. Judd  
Attorney for Debtors  
601 Pennsylvania Avenue, NW  
Suite 900 - South Building  
Washington, D.C. 20004  
Telephone: 202-483-6070

CERTIFICATE OF SERVICE

The undersigned states that on March 29, 2018, a copy of the Opposition to Objection to Debtor's Claim of Exemptions was filed with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Laura J. Margulies, Trustee  
Laura Margulies & Associates, LLC  
6205 Executive Blvd.  
Rockville, MD 20852  
[trustee@law-margulies.com](mailto:trustee@law-margulies.com)

Jon D. Pels, Esq.  
The Pels Law Firm  
4845 Rugby Avenue, 3<sup>rd</sup> Fl.  
Bethesda, MD 20814  
[jpels@pelslaw.com](mailto:jpels@pelslaw.com)

Alvaro A. Llosa, Esq.  
The Pels Law Firm  
4845 Rugby Avenue, 3<sup>rd</sup> Fl.  
Bethesda, MD 20814  
[allosa@pelslaw.com](mailto:allosa@pelslaw.com)

Fitzgerald Lewis  
11490 Commerce Park Drive, Suite 510  
Reston, VA 20191  
[rvaugn@oconnorandvaughn.com](mailto:rvaugn@oconnorandvaughn.com)

/s/ Kevin Judd  
Kevin D. Judd